

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

REYNALDO JR. RODRIGUEZ-PAGAN,
Defendant.

CRIM. NO. 25-026-1(ADC)

SENTENCING MEMORANDUM

Now appears Mr. *Reynaldo Jr. Rodriguez-Pagan*, through his appointed counsel, submitting the following sentencing memorandum in support of a sentence of one (1) year probation, which reflects the nature and circumstances of his offense, history, characteristics, and which is “sufficient, but not greater than necessary” to serve the purposes of sentencing set forth at 18 U.S.C. § 3553(a)(2).

Mr. Rodriguez has reviewed the presentence investigation report and has no objections to the same.

Sentence Recommendation

Mr. Rodriguez pled guilty to **Count One** of the Information pursuant to the terms of a Plea Agreement under Rule 11(c)(1)(B), accepting that he knowingly and willfully violated 18 U.S.C. § 641¹.

The parties stipulated a sentencing recommendation of a one (1) year probation, after due consideration of the 18 U.S.C. § 3553(a) relevant factors.

¹ Knowingly and willfully embezzle, steal, purloin and convert to his own use or the use of another, money of the Social Security Administration (SSA), a department or agency of the United States, namely payments issued by the United States Department of Treasury, on behalf of the SSA, which payments were made payable to L.P.C. to which he knew he was not entitled, having a value in excess of \$1,000, that is, approximately \$32,447.00.

Mr. Rodriguez has a Criminal History Category level of 1 and a total offense level of eight (8) under the United States Sentencing Guidelines.

Characteristics

Mr. Rodriguez is a 58-year-old United States citizen born in Queens, New York, where he was raised by married parents, who imparted him values and discipline. Mr. Rodriguez was close to both his parents, who provided a healthy upbringing overall, free of abuse or domestic violence. He feels fortunate having been raised in a Christian household with strong faith-based values and where he was taught to attend church regularly.

Mr. Rodriguez enjoys listening to music, viewing movies, social media and reading the Bible. He enjoys swimming and watching basketball. He also plays piano, guitar and bass. He described himself as a serviceable and respectful person.

Mr. Rodriguez is currently single, focused on working hard and attends the *Movimiento Avivamiento Mundial (MAM) Church* of Pastor Gabito Rodriguez Rosa in Isabela, Puerto Rico. He also serves as a minister at a Facebook radio channel “La Hora Zero”.

He obtained a radio station license from the Federal Communications Commission, for General Mobile Radio (GMRS), No. WRMN293 with expiration date May 6, 2031.

Mr. Rodriguez is currently a manager at Planet Solar Inc. working full-time earning a monthly income of \$2,000, plus a 12% commission of every sale.

He is interested in getting trained in survival techniques and being CPR certified. He is committed to preparing for emergency scenarios where he can serve and help others in need. He also wants to know more about the solar energy system and start his own printing/graphic design store.

Substance Abuse

Mr. Rodriguez started smoking marihuana seven (7) years ago due to the sciatic nerve pain. He used to drink socially but stopped drinking after his divorce. Mr. Rodriguez has the medicinal cannabinoids Puerto Rico license DM-19269 0 and identification #PA18-00181523. This license will expire on August 2, 2025.

Physical Condition and Medical Needs

Mr. Rodriguez suffers from chronic asthma and the sciatic nerve. He is allergic to Albuterol, penicillin and seafood.

Acceptance of Responsibility

Mr. Rodriguez immediately accepted responsibility for this offense upon learning that he was being charged and is willing as well as making plans to provide full restitution.

He learned his lesson and has positive plans for his life, promising himself and to society that he will not commit further illegalities.

CONCLUSION

Mr. Rodriguez is determined to learn from this bad experience and to live an honest and productive life as well as to help others.

Wherefore, it is respectfully submitted that this Honorable Court adopt the sentencing recommendation and sentence Mr. Rodriguez to a one (1) year probation.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of May, 2025.

S/DAVID RAMOS PAGÁN
DAVID RAMOS-PAGÁN

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that the foregoing motion was electronically filed with the Court using the CM/ECF system which will notify this filing by electronic means to all parties of record.

In San Juan, Puerto Rico, this 22nd day of May, 2025.

S/DAVID RAMOS PAGÁN
DAVID RAMOS-PAGÁN
USDC PR Bar No. 214701
Attorney for Defendant
Urb. El Valle Los Prados
372 Calle del Yagrumo
Caguas, PR 00727-3234
Tel: (787)423-3114
Email: somar2000us@yahoo.com